



Order Filed on January 12, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

**Robertson, Anschutz, Schneid, Crane & Partners
PLLC**

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Fairfield, NJ 07004

Telephone No.: 973-575-0707

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Attorneys for Secured Creditor

Harold Kaplan (HK 0226)

In Re:

LORI KIM ANDREWS JONES,

Debtor.

Case No.: 21-16020

Chapter: 13


Hearing Date: 01/18/2022

Judge: Andrew B. Altenburg Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: January 12, 2022



Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

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Secured Creditor: JPMorgan Chase Bank, N.A.

Secured Creditor's Counsel: Robertson, Anschutz, Schneid, Crane & Partners PLLC

Debtors' Counsel: Law Offices of Andrew B. Finberg, LLC

Property Involved ("Collateral"): 2019 Land Rover Range Rover Sport (VIN:
SALWV2SV9KA847993)

Relief sought: ☒ Motion for relief from the automatic stay
☐ Motion to dismiss
☐ Motion for prospective relief to prevent imposition of automatic stay
against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion(s) is (are) resolved,
subject to the following conditions:

1. Status of post-petition arrearages:

☒ The Debtor is overdue for 2 months from December 13, 2021 through January 13,
2022 at \$1,402.27 per month.

Funds Held In Suspense 0.00

Total Arrearages Due \$2,804.54.

2. Debtor must cure all post-petition arrearages, as follows:

☒ Beginning on February 13, 2022, regular monthly payments shall
continue to be made in the amount of \$1,402.27.

☒ Beginning on February 13, 2022, monthly cure payments shall be made in the amount
of \$467.42 for 5 months. A 6th and final cure payment shall be made in the amount of
\$467.44 on, or before, July 13, 2022.

3. Payments to the Secured Creditor shall be made to the following address(es):

☒ Regular monthly payment: JPMorgan Chase Bank, N.A.
National Bankruptcy Department

P.O. Box 901032
Ft. Worth, Texas 76101-2032

■ Monthly cure payment: JPMorgan Chase Bank, N.A.
National Bankruptcy Department
P.O. Box 901032
Ft. Worth, Texas 76101-2032

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$188.00.

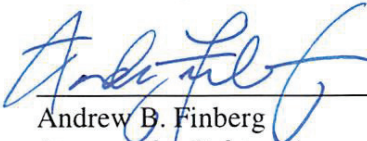
The fees and costs are payable:

■ Through the Chapter 13 plan.

☐ To the Secured Creditor within _____ days.

☐ Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.



Andrew B. Finberg
Attorney for Debtor(s)
Date: 1/12/2022

/s/Harold Kaplan

Harold Kaplan
Attorney for Secured Creditor
Date: 1/12/2022

In re:
Lori Kim Andrews Jones
Debtor

Case No. 21-16020-ABA
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-1
Date Rcvd: Jan 12, 2022

User: admin
Form ID: pdf903

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 14, 2022:

Recip ID	Recipient Name and Address
db	+ Lori Kim Andrews Jones, 48 Whyte Drive, Voorhees, NJ 08043-4152

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 14, 2022

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 12, 2022 at the address(es) listed below:

Name	Email Address
Andrew B. Finberg	on behalf of Debtor Lori Kim Andrews Jones andy@sjbankruptcylaw.com abfecf@gmail.com;finbergar39848@notify.bestcase.com
Denise E. Carlon	on behalf of Creditor U.S. Bank N.A., successor trustee to LaSalle Bank National Association, on behalf of the holders of Bear Stearns Asset Backed Securities I Trust 2007-HE7, Asset-Backed Certificates Series 2007-HE7 dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Gregory Lomax	on behalf of Creditor Lauletta Birnbaum LLC glomax@lauletta.com, vmarr@lauletta.com
Harold N. Kaplan	on behalf of Creditor JPMORGAN CHASE BANK N.A. hkaplan@rasnj.com, informationathnk@aol.com
Holly Smith Miller	on behalf of Creditor Regency Accounts LLC hsmiller@gsbblaw.com

District/off: 0312-1

User: admin

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Date Rcvd: Jan 12, 2022

Form ID: pdf903

Total Noticed: 1

Holly Smith Miller

on behalf of Plaintiff Regency Accounts LLC hsmiller@gsbblaw.com

Inez M. Markovich

on behalf of Creditor National Financial Solutions LLC imarkovich@mccarter.com, rstratz@andersonkill.com

Isabel C. Balboa

ibalboa@standingtrustee.com

Isabel C. Balboa

on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com summarymail@standingtrustee.com

Sindi Mncina

on behalf of Creditor JPMORGAN CHASE BANK N.A. smncina@raslg.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 11